



NATIONAL RENDERERS ASSOCIATION, Inc.

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June 1, 2005

Docket No. 050-15-1
Regulatory Analysis and Development, PPD, APHIS
Station 3C71
4700 River Road Unit 118
Riverdale, Maryland 20737-1238

***Re: Docket No. 050-15-1, National Animal Identification System (NAIS)
Draft Strategic Plan***

To Whom It May Concern:

The National Renderers Association (NRA) references APHIS's Docket No. 050-15-1, the agency's draft strategic plan for the National Animal Identification System (NAIS).

NRA is the international trade association for the industry that safely and efficiently recycles animal agriculture by-products into valuable ingredients for the livestock, pet food, chemical and consumer product industries. NRA represents its members' interests to Congress, regulatory and other government agencies, promotes greater use of rendered products, and fosters the opening and expansion of trade between North American exporters and foreign buyers. NRA's membership represents more than 98% of the rendering capacity in both the U.S. and Canada.

NRA members are proud to be a critical component of the nation's animal disease control and public health infrastructure, and cooperated fully with the enhanced BSE surveillance testing in 2004 and 2005, gathering a significant portion of the samples. Renderers can also be of immense help to APHIS in many other animal disease programs by closing the loop on animals that die on the farm.

The NRA continues to support regulations on the identification and tracking of livestock to facilitate disease surveillance and control, and believe that all dead and downer

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animals should be processed via federally licensed, permitted, and regulated methods. However, if renderers are required to track the identity of dead stock picked up and transported to rendering facilities, producers should be responsible for applying appropriate identification of the animals before they leave the production premises.

On March 4, 2004 APHIS published amendments (Docket No. 99-017-3) to the 9 CFR Part 71 regulations governing interstate transportation of animals including blood and tissue collection at slaughtering and rendering establishments. In discussing industry guidance with APHIS to implement these regulations, we have pointed out that rendering establishments are not built or maintained like slaughter establishments, nor do renderers normally keep the type of animal identification records described in 9 CFR, parts 71, 75, 78, 79, and 85.

New record keeping systems may be required of renderers to comply with the 9 CFR Part 71 regulations, and renderers will do what they can to facilitate the tracing of animals to the farms of origin. However, we are concerned that the NAIS does not address animal identification beyond death unless it occurs in a federally inspected slaughter facility. Individual identification devices approved for use on cattle and other animals should facilitate information and tracking required of renderers. If such devices are removed from animals upon death, some other form of identification should be attached to the dead animals. If lot identification is approved for poultry and pigs, and renderers are required to trace those carcasses back to their source, then producers should apply some type of identification to provide the required information to renderers. A number of states have already required that renderers register for premises ID numbers. These states have assumed that the AIN will remain with the animal until it is either slaughtered for meat or it dies and rendered. Trucks often pick up dead stock from multiple farms, and it is not reasonable to expect route drivers to apply the required individual animal identification devices.

We emphasize again that renderers are an essential component of the animal disease control and public health infrastructure, and we are eager to do our part. However, the NAIS must consider animal identification through all the channels of commerce, including rendering, to make the system work smoothly and efficiently. The NAIS should be coordinated with regulations governing blood and tissue collection at rendering establishments. It makes no sense to leave a dead stock loophole in producer animal identification requirements and then expect renderers to be able to track the sources of animal mortalities.

APHIS should consider more fully how Animal Identification Numbers (AINs) will be retired. AINs retired by death other than slaughter should be of paramount importance to APHIS to establish a system that can monitor, control, and eradicate animal diseases by rapid tracing of an outbreak situation. Packers and lockers will provide AINs, premise identification numbers and dates from healthy animals. Independent renderers could report AINs, premise identification numbers, and dates on animal mortalities they pick up. Who will report mortalities that are buried, incinerated, composted, or disposed in land fills? Will each plot of land used for burial be required to have a premise

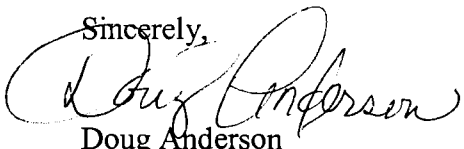
identification number and will the owner be required to submit the AINs and dates for animal buried there? Will each incinerator require a premise identification number and their operators the responsibility of reporting AINs and dates? The same questions can be applied to a compost facility or landfill operator. If all disposal methods are not held to similar requirements, some producers may avoid regulated methods to dispose of animals suspected to have a foreign animal disease. Of course these are often the most important animals for APHIS to sample and trace.

Final carcass handlers should qualify as AIN managers as mentioned on page 19, under Stage III, number 2 in the draft. Thus, renderers and 3-D or 4-D dead animal haulers could report AINs, premise identification numbers, and dates on animal mortalities they pick up to ensure that the trace back trail for all animals is complete. New identification requirements and disposal costs may increase the number of carcasses left for scavengers or otherwise illegally disposed of. This problem may also need to be addressed.

NRA and its members pledge their continued commitment to animal disease control and public health.

Thank you for consideration of our views.

Sincerely,

A handwritten signature in cursive script, appearing to read "Doug Anderson".

Doug Anderson

Chairman

National Renderers Association